

Lyew, Sandra

August 28, 2015

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1 **use this letter as evidence that the request has been**
2 **submitted.**

3 Q. That's good.

4 So that -- there is a bunch of things in
5 there. One thing that I wanted to ask about is this
6 is identifying a second AUD. So we talked about one.
7 But this appears to be identifying a second one
8 because it has a different control number. Is that
9 your understanding?

10 A. Yes.

11 Q. So that AUD is something that we haven't
12 seen produced in this case. Have you seen it?

13 A. No.

14 Q. Okay. The date of this is -- so this is
15 in the April 2014 time period. And Mr. Nolan had
16 asked you some concerns in terms of sequential
17 timing. This was shortly after the letter from the
18 borrower. Do you recall that letter?

19 A. Yes.

20 Q. So I'll show you the letter. It's
21 Exhibit 15. And keep that Exhibit 5 open, because
22 I'm going to ask you another question about it. But
23 Exhibit 15 is the letter that was sent by
24 Mr. Daugherty to the research department?

25 A. Yes.

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1 Q. And in it he says that he's got --
2 Equifax -- this is a quote from the letter --
3 "Equifax showing that we owe a total of \$168,750."

4 Maybe it will help if you have the
5 letter.

6 A. Okay.

7 Q. So it's like midway through -- right
8 here. Do you see where Mr. Daugherty is saying that?

9 A. Yes.

10 Q. But if you turn to two documents further
11 back in that same exhibit, it's OLS 574, where it
12 shows the account balance that's being reported by
13 Equifax. It appears to indicate a balance of
14 \$85,000 --

15 A. I'm looking at what he mailed in. I'm
16 sorry.

17 Q. That's okay.

18 A. Okay.

19 Q. So he's circled it on page 571. And the
20 arrow -- and just above that arrow it has a balance.
21 Do you see that balance amount?

22 A. I see it.

23 Q. And the amount is about 85,000 and
24 change, right?

25 A. Yes.

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1 Q. So that's inconsistent with what this
2 letter says, right?

3 A. Yes.

4 Q. And when a borrower makes a
5 representation in a letter, OCWEN has an obligation
6 to investigate it? They just can't take the borrower
7 at their word, correct?

8 A. Correct.

9 Q. Then he's pointing to -- 574, there is
10 also another circle with a bunch of arrows. It
11 appears to be pointing to March through December of
12 2013. Do you see that?

13 A. Yes.

14 Q. So he's saying it's inaccurate that he
15 was reported as late. I can't make out the document,
16 but, if you look at the letter, the letter shows he
17 was late in 2013?

18 A. Yes.

19 Q. So that would be another inconsistency
20 with his letter, right?

21 A. Yes.

22 Q. So when it's saying that he's being
23 reported by Equifax as late April through December,
24 in this Exhibit 5 comment OCWEN is responding that
25 there was only one month in that time period that was

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1 late, and that was March 2013, right?

2 A. March and June. In June I believe he
3 was 30 days late.

4 Q. Let's look back to this monthly data
5 tape, which is Exhibit 26. It would have been
6 June 2013, which I believe is -- would that be 621?

7 A. Yes. So I was right. May. May he was
8 30 days past due. As of March 2012 his loan was
9 delinquent and in foreclosure proceedings at that
10 point.

11 Q. Well, I'm asking specifically about
12 2013. So --

13 A. Oh. 2013.

14 Q. Yes. So March, you'll see that
15 Mr. Daugherty states he was late March 2013 in this
16 letter marked as Exhibit 15, which is different from
17 what he's representing in the Equifax report. But
18 now I'm asking you about 2013.

19 A. Okay.

20 Q. Were there any other months -- you had
21 maybe June when he was late. Does it appear that
22 OCWEN reported him as late in June of 2013?

23 A. No. It was March 2013.

24 Q. Okay. How do you know that? What are
25 you looking at, for the record?

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1 A. I'm looking at the history, the account
2 history information.

3 Q. And that's Exhibit 26?

4 A. Page 619.

5 Q. Okay. There were a number of instances
6 in which OCWEN responded to customer disputes; is
7 that fair to say?

8 A. Yes.

9 Q. And a number of those disputes were
10 repetitive or duplicative, right?

11 A. Yes.

12 Q. Nonetheless, OCWEN undertook an
13 investigation for each one of them?

14 A. Yes. OCWEN did it.

15 Q. And that has a cost associated with it,
16 right?

17 A. Yes. And can I say for the record that
18 as of page 635, which is for May -- May 1st, 2014
19 removed the late, 30-day late, for March 2013.

20 Q. Okay. So I'm there now. How do you
21 know that?

22 A. Because it's showing on the account
23 information and OCWEN's records.

24 Q. Okay.

25 A. And so that's how -- if there was

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1 changes made at that point, that's what would have
2 been sent to the credit bureaus.

3 Q. Do the credit analysts at OCWEN have
4 access to these screen shots, the monthly reporting
5 data, which has been marked as Exhibit 26, when
6 they're undertaking their review?

7 A. Yes.

8 Q. So is that part of the review process if
9 that dispute is identified regarding things like
10 account history or account information?

11 A. Yes. And dealing with credit reporting
12 based on the amount of disputes that comes -- came in
13 per month on this account.

14 Q. You mentioned a number of systems, but,
15 when a credit analyst receives the dispute, what
16 information is available to them as part of their
17 investigation of that dispute?

18 A. Real Servicing, which is the OCWEN
19 system.

20 Q. Before you move on, tell us what type of
21 information is available on Real Servicing.

22 A. The payment history. Retrieving the
23 payment history. Reviewing the payment history.
24 Reviewing the notes in the system. Again, should
25 they have the capability of reviewing based on their

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1 authority for OCWEN -- for any additional
2 information, like escrow.

3 Q. So that's --

4 A. Normally it's payment history and loan
5 history in regards to the account.

6 Q. That's Real Servicing. And then are
7 there other systems or programs available?

8 A. They have the system that was once
9 called CIS. It's now called The Vault, which has the
10 imaging documents of the borrower's account, and the
11 mortgage origination, closing documents, any
12 correspondence received, sent out by OCWEN.

13 Q. So the Real Servicing, CIS, also known
14 as The Vault. Any other systems or programs
15 available?

16 A. The credit reporting also, again
17 e-Oscar, which does the communication to credit
18 bureaus.

19 Q. On this loan there was an additional
20 system or systems because it was a
21 Litton-formerly-serviced account.

22 A. Yes.

23 Q. What were those systems called?

24 A. RADAR and LSAMS.

25 Q. Okay. But would that be available for

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1 any account or would it just be available for Litton
2 accounts?

3 A. No. Just the Litton -- Litton is the
4 only company.

5 Q. So as part of the training policies,
6 practices, the credit analyst is to review all the
7 systems -- all available information in order to
8 determine the response to the dispute?

9 A. To conduct the full investigation to
10 respond to the dispute.

11 Q. There were a number of -- obviously
12 there was a number of disputes in this case. And
13 there are notes pertaining to those disputes.
14 Sometimes the notes appear to be incomplete. Do the
15 notes reflect everything that is being done or what
16 is being transcribed in these notes?

17 A. In most cases they verified on what they
18 did in order to verify that this account belongs to
19 Mr. Daugherty.

20 Q. If the dispute was more than what is an
21 01, not his, not hers, if there was something
22 additional, would there be an additional inquiry?

23 A. Inquiry in the note log?

24 Q. By the credit analyst to respond.

25 A. Yes. So if the ACDV was received with

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1 more than one dispute, that's how they would go ahead
2 and investigate, based on each dispute that is
3 received.

4 Q. So I'll give you an example. Exhibit 17
5 is an ACDV response.

6 A. I have one.

7 Q. And this has a different code. This one
8 is -- it's not the 001, not his. It's 106. And it's
9 described as disputes present/previous account
10 balance, payment history profile, payment rating.
11 And then the instruction is verify payment history
12 profile, account status, and payment rating.

13 A. Yes.

14 Q. And each of those is a field; is that
15 right?

16 A. Yes.

17 Q. So specifically this dispute is asking
18 OCWEN to verify the payment history profile, the
19 account status, and the payment rating; is that
20 right?

21 A. Yes.

22 Q. So if you go towards the bottom, account
23 status, it has been filled in with an 11 code, as
24 current account; is that right?

25 A. Yes.

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1 Q. And that's different from what was sent
2 to OCWEN; is that right?

3 A. Yes. Different from the request.

4 Q. Okay. So that means somebody at OCWEN
5 reviewed the information after an investigation, they
6 responded with an update on this form, right?

7 A. Yes.

8 Q. Okay. The next thing is payment rating.
9 There was no payment rating in this request, correct,
10 under account information?

11 A. No.

12 Q. It's blank on the request side?

13 A. Yes.

14 Q. Okay. So then the third thing that's
15 being specified here is account -- we already did
16 account status -- payment history profile. So if we
17 turn to the account history, which is on the second
18 page, do you see the account history profile there?
19 It's that table about middle of the page.

20 A. Yes.

21 Q. So it has a list of years. And just for
22 the record, this is Bates 1344. It is -- the white,
23 again, is the requested information, and that's the
24 information that came over through e-Oscar to OCWEN
25 from the CRA, and then the gray is OCWEN's response;

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1 is that right?

2 A. Yes.

3 Q. Okay. So in 2013 you've got a number of
4 white and gray boxes. If we look at really 2014 and
5 2013, there isn't a single gray box indicating late,
6 except for March 2013; is that right?

7 A. Yes.

8 Q. And that's different from the request
9 data?

10 A. The request data?

11 Q. The white boxes.

12 A. Yes. Yes.

13 Q. The white boxes have either the number 4
14 or the letter D in them, do you see that?

15 A. Yes.

16 Q. And then the gray boxes for those same
17 two years, 2014 and 2013, have zeros in every box,
18 with the exception of March 2013 which is a 1?

19 A. That is correct.

20 Q. So that reflects that OCWEN has
21 responded that the information that came over from
22 the CRA showing late of 120 days should be updated to
23 being current?

24 A. Yes.

25 Q. And those were the three fields that are

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1 identified on this dispute code 1 on page 1, Bates
2 1343, right?

3 A. Yes.

4 Q. What was the date of this ACDV response?

5 A. April 24, 2014.

6 And just to reflect back to March,
7 30-day, 2013.

8 Q. Yes.

9 A. It was removed; however, the reason why
10 it was -- it was marked as 30 days, because the
11 borrower did send a payment in; however, it was
12 returned due to insufficient funds.

13 Q. So did OCWEN -- was OCWEN required to
14 change that from late to current?

15 A. No. They're not required to do that.

16 Q. Then why did they do it?

17 A. I don't know. I personally would have
18 left it.

19 Q. Because it was late, but perhaps as --

20 A. Yes.

21 Q. -- an accommodation to the borrower?

22 A. Yes.

23 Q. Based on your review of these documents,
24 were there any monthly data tapes that were reported
25 by OCWEN to the CRAs that were inaccurate?

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1 **A. No.**

2 Q. Okay. That's all the questions I have.

3 Thank you.

4 EXAMINATION

5 BY MR. NOLAN:

6 Q. I just have a couple of quick
7 follow-ups.

8 You discussed policies and procedures
9 and training. Are these written down somewhere at
10 OCWEN?

11 **A. Yes.**

12 MR. NOLAN: Can you-all provide those to
13 us, so we can review them, pursuant to our discovery
14 request? I believe we've requested those.

15 MR. MANNING: I'll make a note of that.

16 BY MR. NOLAN:

17 Q. I wanted to follow up, too, about the
18 changing of the date open. Look at Exhibit 5 of the
19 comment log on page 1644.

20 **A. Yes. The date change was April 30th,**
21 **2012.**

22 Q. It's noted here -- SU is the code. Is
23 that the department that would be reviewing this?

24 **A. Setup.**

25 Q. Setup?

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1 **A. Yes.**

2 **Q. Where is setup in relation to credit**
3 **reporting?**

4 **A. Setup is when the loans are transferred,**
5 **it goes to the loan setup department as part of the**
6 **transfer boarding process.**

7 **Q. So setup noticed a discrepancy in the**
8 **open date and kindly made correction in RS is their**
9 **note here. Is that research?**

10 **A. Yes.**

11 **Q. So setup requested that research change**
12 **the date open on the account from August to July?**

13 **A. The email -- the response probably came**
14 **from the research department to -- in regards to the**
15 **open date being in error by the prior servicer.**

16 **Q. And so --**

17 **A. And sent it to setup to make the**
18 **changes.**

19 **Q. Okay. So research asked setup to make**
20 **these changes?**

21 **A. Yes.**

22 **Q. And then what would setup have -- how**
23 **would they have made that change?**

24 **A. They have -- they're the only ones that**
25 **have access to make that change to the loan history**

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1 in Real Servicing.

2 Q. And then what would have happened to
3 that prior open date?

4 A. And that's based on the business
5 records, the note, the mortgage, is dated -- it has
6 to go -- the open date is the date of the note, the
7 mortgage.

8 Q. And it had been reported incorrectly up
9 to that point by Litton, correct?

10 A. That is correct.

11 Q. And so when setup makes that change,
12 what happens to the prior date? Do they just
13 override a field in a spreadsheet? How do they
14 effectuate that change?

15 A. The date gets corrected in the system,
16 and they notify that the changes have been made, and
17 then it's when it's time to report, the next
18 reporting date to -- through e-Oscar to the bureaus,
19 it will identify the correct open date.

20 Q. Okay. Exhibit 26, I just quickly wanted
21 to ask, page 645, the last page -- it's the one you
22 went over with Mr. Manning. What does the D indicate
23 or -- in the account history where there are numerals
24 and letters and there is a code for D, what does
25 that --

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1 A. The D was dispute.

2 Q. Okay. And then what does a B indicate?

3 A. I don't remember what B is. I think
4 those -- I can only assume that those months were not
5 being -- those months did not get reported, but
6 that's, you know, guessing based on -- based on 2009
7 through 2011, prior to OCWEN receiving it.

8 Q. So that would be Litton's reportings
9 during that time?

10 A. Yeah. Prior to OCWEN.

11 Q. And the information just didn't transfer
12 when the loan got transferred?

13 A. It has a separate trade line.

14 Q. Okay. That's it. We're done.

15 A. Done?

16 MR. MANNING: Okay. Nothing else from
17 me.

18 We're going to read and sign.

19
20 (Whereupon, the deposition was concluded
21 at 3:40 p.m.)
22
23
24
25

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ACKNOWLEDGMENT OF DEPONENT

I, _____, do hereby
acknowledge that I have read and examined the
foregoing testimony, and the same is a true, correct
and complete transcription of the testimony given by
me, and any corrections appear on the attached Errata
Sheet signed by me.

(DATE)

(SIGNATURE)

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C E R T I F I C A T E

COMMONWEALTH OF VIRGINIA,
CITY OF NORFOLK, to wit:

I, Penny C. Wile, RPR, RMR, CRR, a
Notary Public in and for the Commonwealth of
Virginia at Large, do hereby certify that the
foregoing deposition was duly taken and sworn to
before me at the time and place in the caption
mentioned, and that the deposition is a true record
of the testimony given by the witness.

I further certify that I am neither
attorney or counsel for, nor related to or employed
by any of the parties to the action in which this
deposition is taken, nor am I a relative or employee
of any attorney or counsel employed by the parties
hereto, nor am I financially interested in the
action.

Given under my hand this 8th day of
September, 2015.

Notary Public, #212528

My Commission expires: January 31, 2017

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